

MICHIGAN STATE
UNIVERSITY

DOCKET FILE COPY ORIGINAL

November 16, 2000

RECEIVED

NOV 21 2000

FCC MAIL ROOM

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Room TW A325
Washington, D.C. 20554

Re: FCC Docket No. 99-200, Numbering Resource Optimization Order

Dear Ms. Salas:

The Telecommunication Systems Department of Michigan State University is extremely concerned about FCC docket # 99-200, which limits us to holding an unassigned number for a maximum of forty-five days.

We urge you to reconsider implementing this order for the reasons outlined below:

- It is untenable to implement for central office telephone system (such as Centrex) users.
- It reduces current efficiency in providing services to customers.
- It complicates number plans and routing that affect our direct and indirect calling communities.
- Forty-five days is too short and is unreasonable for planning purposes.
- It increases costs for Centrex users.
- It would not reduce the number of telephone numbers that we maintain for growth and planning purposes, using the reservation process.

The attached pages provide details in support of these critical points.

Payment for reservation of numbers beyond forty-five days, comparable to the DID number charge, would seem a fair way to deter the over use of reserved numbers.

Thank you for your consideration in NOT implementing this order.

Sincerely,

Anne M. Phillips

Anne M. Phillips
Manager, Telecommunication Systems
aphillip@pplant.msu.edu
(517)432-9211

[Signature]
11/20/00
11/20/00

c: Roy Simon, MSU

S

**PHYSICAL PLANT
DIVISION**

Telecommunication Systems

Michigan State University
W110 Public Safety Building
East Lansing, MI
48824-1219

517/353-5515
FAX: 517/353-6633

UNFAIR TO CENTREX USERS:

Groups with PBXes (Public Branch Exchanges) are able to reserve unused phone numbers by directing blocks of numbers to the DID (Direct Inward Dial) trunks on their PBX. All numbers are active from the central office, and the PBX administrators can maintain specialized and inactive numbers with dialing plans that will function for the future (Note: PBX administrators may NOT actually have these numbers active in their PBXes and they do pay a small monthly fee for each block of numbers).

Centrex systems are located within a central office, thus it appears that in order to have the same reasonable advantages as those for PBX administrators, we must somehow protect the numbers in our dial plan blocks. This is currently accomplished thru reserving numbers. Under the FCC order, we will need to make these numbers active in the system. The method for doing this in a Centrex environment would result in far lower efficiencies and higher costs as compared to PBX systems (See “Reduces Efficiency” and “Increases Cost”).

REDUCES EFFICIENCY:

After reading the order, we are convinced that we will need to activate phone numbers that complete our number blocks and that are used for specialized events. Many of the specialized events occur on campus on a periodic basis. They do not require active phone lines, but do require that the numbers be retained because many communications resources (such as brochures, web sites, phone books) have these phone numbers published for such events.

By activating our numbers, we must order a “number holding service” (The phrase “number holding service” will be used this document to signify a service that is not needed, but acts to reserve the phone number associated with that service). We will be charged for this service (See “Increases Costs”).

Then, when we would need to use that phone number for a true specialized event or new service requirement, we would be required to continue as follows:

- ▶ Cancel the “number holding service.”
- ▶ Track that 45 days are not being exceeded.
- ▶ Order the new service that requires the number.
- ▶ Oversee that the vendor does order the new service prior to the “number holding service” being cancelled, as quick service would require parallel processing of the “remove” and “install” steps above.
- ▶ Verify that billing on the removal occurred properly.
- ▶ Verify that billing on the installation occurred properly.

Notice that the scenario above has the overall affect of our group opening, tracking, and closing three requests for service with our vendor, as compared to one! (The first request would reserve the number, the second would remove the number from ‘number holding service’ status and the third would install our actual service).

This would not be efficient and is honestly a gross misuse of staff time. Furthermore, it is difficult to hire personnel experienced with the technology.

COMPLICATES NUMBER PLANS AND ROUTING:

We currently provide services to an international community of some 50,000 users. They use the ten thousand number blocks to indicate that they should dial the last five digits of the number as compared to dialing a local number (The system phone number blocks are patterned like (517)353-xxxx, (517)432-xxxx, (517)355-xxxx, or (517)884-xxxx). We also have several secondary systems, equipment interfaces and publications that rely on the five digit dial pattern being in place.

The number blocks that define our system's number plan also identify routing for several groups that route calls to our systems directly, using tie-lines.

It is difficult to predict all the ways that losing number in these numbers blocks will negatively impact our dialing patterns or the other networks connected to our systems. Several scenarios might include:

- ▶ A phone user on our Centrex could think that a number assigned to a local business or resident was part of our system. They would dial the last five digits and be unsuccessful in reaching the local phone.
- ▶ A phone user on our Centrex could think that a system phone number was a local number and dial the local access number to reach the phone. Their call would complete, but they would be charged for making a local call and would not know until the bill arrived.
- ▶ A network routing calls directly to our system could route calls to our Centrex that should be routed to the local community. Those calls would either not complete, or would cost us a local call that we should not have to pay.

FORTY-FIVE DAYS TO RESERVE NUMBERS IS UNREASONABLE:

As stated, we have many numbers that are reserved for specialized events that may only be needed a few months out of the year. It is impractical to keep these lines year-round due to cost and security concerns (the event areas are not monitored beyond the time of the event). The numbers for these events will require reservation times beyond 45 days, but will never exceed one year. Reserving numbers for consistent number blocks (see "Complicates Number Plans and Routing") should be reserved for several years before they are all utilized, as dial plans need a longer planning window.

In addition, when a new system is required, especially when it involves new construction, it is often necessary that public relations documents be published well in advance of the telecommunications facilities being active. The building may not be completed or may be in the process of remodeling, preventing the service activation. These situations invariably require planning times that exceed forty-five days.

INCREASES COST:

We currently do not pay to reserve numbers.

If we had a PBX and needed to reserve numbers for growth and for a simpler dial plan, it would cost \$0.125 per number (\$5/40 DID numbers = \$.125/number). In our existing Centrex situation, each number reservation would include a \$50 non-recurring cost to install the number in an active status, and then approximately \$20/mo for service.

As outlined in "Complicates Number Plans and Routing", this order could increase the number of local calls that are made in error.

NO REDUCTION IN THE QUANTITY OF NUMBERS RESERVED:

We believe that the intent of this order is to curtail the hoarding (reserving) of phone numbers so that other groups may use them.

The Telecommunication Systems Department feels that it will be required to take some action to ensure that it always has room in its number blocks for future growth, planning, for recurring specialized events, and to ensure a clear, consistent dialing plan for its system users.

Implementation of the order as it stands will STILL result in our holding similar quantities of number blocks, and will make the process of providing service to our customers extremely inefficient and costly.